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January 20, 2022

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Application GRANTED. The proposed dates in this letter are so ordered. By February 4, 2022, the parties shall file a status letter, including any proposed summary judgment briefing schedule.

Dated: January 20, 2022
New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *The New York Times Company et al. v. United States Central Command*, No. 21-cv-08297

Dear Judge Schofield:

I am counsel for plaintiffs The New York Times Company and its reporter Charlie Savage (jointly, "The Times") in the above-captioned action brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552. I submit this joint letter on behalf of all parties to respectfully request an extension of the deadline for the parties to determine whether cross-motions for summary judgment will be necessary and to provide a status report to the Court. The Times received CENTCOM's initial production two days ago. It is currently reviewing the production and considering whether motions practice will be needed.

Accordingly, we propose that the schedule be amended as follows:

- February 3, 2022: Deadline for parties to meet and confer as to whether cross-motions for summary judgment will be necessary.
- February 4, 2022: Parties to provide status report to the Court and propose a summary judgment briefing schedule if needed.

Under the parties' original proposed schedule, which the Court endorsed on December 3, 2021 (ECF No. 11), CENTCOM was to make a final determination and release any part of the footage deemed disclosable by January 6. The parties were to meet and confer by January 20 and provide a status report to the Court and propose a summary judgment briefing

schedule if needed by January 21. By letters dated January 6 and January 12, and with The Times's consent, CENTCOM requested an extension of the final determination deadline to January 18, which the Court granted (ECF No. 14). On January 18, CENTCOM partially released the requested records to The Times.

On January 20, the parties met and conferred. They now respectfully write to request additional time to review the production and to determine whether summary judgment briefing will be necessary.

We thank the Court for its consideration of this submission.

Respectfully submitted,

/s/ David McCraw

David McCraw

cc: All counsel of record (via ECF)